BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Consider the Adoption of a General Order and Procedures to Implement the Digital Infrastructure and Video Competition Act of 2006.	R.06-10-005 (Filed October 5, 2006)

OPENING COMMENTS OF AT&T CALIFORNIA ON DRAFT OPINION RESOLVING ISSUES IN PHASE II (FILED 8/24/07)

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AT&T California, pursuant to Rule of Practice and Procedure 14.3 of the California Public Utilities Commission ("Commission"), provides the following opening comments on the **Draft Opinion Resolving Issues In Phase II (Filed 8/24/07)** (hereinafter, "Proposed Decision" or "PD").

I. INTRODUCTION

AT&T California's comments focus on two legal errors contained within the Proposed Decision: the imposition of two new reporting requirements that plainly contravene the Digital Infrastructure and Video Competition Act of 2006 ("DIVCA" or "the Act").

DIVCA's purpose is to create *competition* for video services. The Act finds that "*[i]ncreasing competition* for video and broadband services is a matter of statewide concern,"[1] because *increasing competition* will: (1) provide consumers with more choice, (2) lower prices, (3) speed the deployment of new communication and broadband technologies, (4) create jobs, (5) benefit the California economy, and (6) increase opportunities for programming that appeals to California's diverse population and many cultural communities.[2] Plainly, DIVCA intends to benefit Californians by increasing video *competition*, not increasing video *regulation*.

To this end, DIVCA repeatedly emphasizes that the Commission has very limited authority over video services and video service providers. In two separate provisions, DIVCA clarifies that the Commission's broader authority over public utilities does not apply to video service providers. Section 5810(a)(3) states that "video service providers *are not public utilities*

[1] Pub. Util. Code § 5810(a)(1) (emphasis added). All code references are to the Public Utilities Code, unless otherwise indicated.

[2] § 5810(a)(1)(B); § 5810(a)(1)(D).

or common carriers,"[3] and section 5820(c) confirms that "[t]he holder of a state [video] franchise *shall not be deemed a public utility* as a result of providing video service…."[4]

Consistent with this intent, the plain and express language of DIVCA carefully limits the Commission's authority:

> Neither the commission nor any local franchising entity or other local entity of the state may … *impose any requirement* on any holder of a state franchise *except as expressly provided* in [DIVCA].[5]

DIVCA does not expressly provide for the two new reporting requirements contained in the Proposed Decision, thus the Commission may not impose them. DIVCA sections 5920 and 5960 set forth *the* specific reporting requirements authorized by DIVCA, and these new reporting requirements are not among them.

In attempting to justify the additional reporting requirements, the Proposed Decision opines,

> We disagree that the imposition of further reporting requirements violates DIVCA. However, we agree generally with the comments of current or potential providers of video programming and broadband services that DIVCA intends video programming and broadband services to be offered in a competitive environment, and that the Commission should avoid imposing additional data requirements that impose a heavy burden on service providers yet do not assist the Commission in carrying out its role.[6]

In other words, the Proposed Decision interprets DIVCA to authorize additional reporting requirements so long as they (1) "assist the Commission" and (2) do not "impose a heavy burden on service providers." This interpretation completely ignores the intent and express language of DIVCA. Nowhere does DIVCA allow the Commission to impose reporting requirements as long

[3] § 5810(a)(3) (emphasis added).

[4] § 5820(c) (emphasis added).

[5] § 5840(a) (emphasis added).

[6] Proposed Decision, p. 22.

as they "assist the Commission" and do not impose "a heavy burden." To the contrary, DIVCA plainly states that the Commission may not "*impose **any** requirement* on any holder of a state franchise *except as expressly provided* in [DIVCA]."[7]

A. Reporting Video Customers By Census Tract

The Proposed Decision would require franchise holders to report the number of households in each Census Tract of its Service Area that subscribe to its video service.[8] The PD opines this "data will be useful for ensuring enforcement of the nondiscrimination and build-out provisions of Section 5890,"[9] and more specifically that "video subscriber data will be necessary information for the Commission so that it can determine whether to initiate action on its own motion to enforce Section 5890(a)."[10] Contrary to these claims, this proposed reporting requirement would violate DIVCA and would not assist the Commission in enforcing Section 5890(a).

First, as discussed above, DIVCA does not authorize the Commission to impose any reporting requirements it merely deems to be "useful" or even "necessary" in ensuring enforcement of the Act. Instead, DIVCA expressly prohibits the Commission from "*impos[ing] **any** requirement* on any holder of a state franchise *except as expressly provided* in [DIVCA]."[11] DIVCA even enumerates the reporting requirements the Commission may impose, and subscriber data is not one of them.[12]

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[7] § 5840(a) (emphasis added).

[8] Proposed Decision, pp. 37-38 (Ordering Paragraph 2.d).

[9] Proposed Decision, p. 24.

[10] Proposed Decision, p. 25.

[11] § 5840(a) (emphasis added).

[12] §§ 5920, 5960. Precisely this kind of reporting was proposed during DIVCA negotiations in the Legislature last year. Requiring it now—after it was clearly considered and rejected—would unquestionably

Second, the Commission's authority to regulate public utilities does not allow it to impose a video subscriber reporting requirement, or any other requirement, on video service providers. Again, DIVCA plainly provides that "video service providers *are not public utilities* or common carriers,"[13] and that "[t]he holder of a state [video] franchise *shall not be deemed a public utility* as a result of providing video service…."[14]

Third, contrary to the Proposed Decision's reasoning, subscriber data by tract are not "necessary information for the Commission so that it can determine whether to initiate action on its own motion to enforce Section 5890(a)."[15] DIVCA prohibits income-based discrimination in offering *access* to potential subscribers, it does not require a certain composition of *actual* subscribers.

Section 5890(a) provides (emphasis added),

> A cable operator or video service provider that has been granted a state franchise under this division may not discriminate against or deny *access to* service to any group of *potential* residential subscribers because of the income of the residents in the local area in which the group resides.

The very next subsection, 5890(b), provides that franchise holders such as AT&T meet the requirements of 5890(a) if certain milestones are satisfied[16] regarding the percentage of households "*with access to* the holder's video service."[17] The Act defines "access" to mean "that the holder is capable of providing video service at the household address…regardless of whether

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undermine legislative intent.

[13] § 5810(a)(3) (emphasis added).

[14] § 5820(c) (emphasis added).

[15] Proposed Decision, p. 25.

[16] The holder must also meet certain community center requirements. Pub. Util. Code § 5890(b)(3).

[17] Pub. Util. Code § 5890(b)(2) (emphasis added). This provision makes plain that franchise holders have three years to meet DIVCA's non-discriminatory access requirement. Thus, any related reporting before then is unnecessary.

any customer has ordered service…."[18] Accordingly, DIVCA requires the reporting of the number of households "offered" video service, [19] and the number of low-income households "offered" video service.[20] Thus, DIVCA's plain language makes clear that its non-discrimination requirement applies to "access," not subscriber composition. Of course this reflects two important realities: (1) no rational new entrant would make the sizable capital investment necessary to provide access to video service in a particular area, and then refuse to sell it; and (2) franchise holders cannot force customers to actually subscribe to their service.

Fourth, it would be particularly inappropriate to require new entrants to report geographically granular subscriber data. Such data are highly proprietary trade secrets. As new entrants sign up customers, the number and location of those customers can easily be used by incumbent competitors to identify a new entrant's rollout plans. The incumbent can then target promotional offerings and deny the benefits of such offerings to its broader customer base. Even if done on an "aggregated" basis, reporting of such data for geographic areas where there is only one franchise holder would reveal that holder's detailed subscriber data. Nonetheless, the Proposed Decision only provides that new entrant video subscriber data "may" be accorded proprietary treatment.[21]

Fifth, compliance with the nondiscrimination and build-out requirements of section 5890 is measured at the level of the provider's entire service area.[22] Because the requirements do not

[18] Pub. Util. code § 5890(j)(4).

[19] Pub. Util. Code § 5960(b)(2)(A)(ii).

[20] Pub. Util. Code § 5960(b)(3)(ii).

[21] Proposed Decision, p. 25.

[22] Providers are already required to report the total number of video subscribers annually, per G.O. 169. General Order 169, p. 19 (section D(2)).

apply on a census tract basis, the Commission has no need to see subscriber data at the census tract level.

B. Reporting The Type Of Wireless Broadband Technology

The Proposed Decision also would impose the following additional reporting requirement:

> The subscriber data relating to non-wireline Broadband shall indicate whether the subscription is for a data-enabled cellular phone, PDA or other wireless hand-held device, or whether the subscription is for the use of a wireless data card.[23]

This additional reporting requirement would violate DIVCA, and would not provide the Commission with meaningful data.

As indicated above, DIVCA expressly prohibits the Commission from imposing "*any requirement* on any holder of a state franchise *except as expressly provided* in [DIVCA]."[24] DIVCA does not expressly provide that franchise holders are required to report the type of non-wireline broadband technology used. In fact, DIVCA provides the opposite. On the issue of non-wireline technology, DIVCA requires only the reporting of "*[w]hether* the broadband provided by the holder utilizes wireline-based facilities *or another technology*."[25]

Moreover, the data that would be reported would not be meaningful. The Proposed Decision's rationale for requiring this data is as follows:

> We believe areas currently unserved or underserved by broadband at this point will likely be rural areas, or other areas that are high cost due to distance, terrain, demographics and density issues. It is thus important that the Commission gather data that will help us understand *the extent to which wireless broadband is*

[23] Proposed Decision, p. 36 (Ordering Paragraph 2.c).

[24] § 5840(a) (emphasis added).

[25] § 5960(b)(1)(C) (emphasis added).

> *reaching these difficult-to-serve areas, and the degree to which consumers view these services as a means to satisfy their on-line needs*.[26]

However, AT&T has already provided the Commission with information that readily identifies where wireless broadband is available, including rural or underserved areas. Specifically, AT&T has provided digital maps showing where wireless broadband has been deployed and is commercially available to end users, and AT&T will continue to provide this information on an annual basis. It is this information, not details about specific devices, that shows where "wireless broadband is reaching." Specific device details are not meaningful because by their very nature, wireless hand-held devices and data cards are mobile—they can be used in different places at different times—and they cannot be pinned down to specific geographic areas.

Moreover, whether the device used is "hand-held" or a data card would not reveal "the degree to which consumers view these services as a means to satisfy their on-line needs." Although it appears the Commission believes data cards are more likely to satisfy a customer's needs, hand-held devices are used more-and-more for general internet access, web browsing and applications such as email, which were once available only through computers. Devices are evolving rapidly to provide ever-greater speed, capacity and capabilities. The small form factor and mobility of handhelds can in many instances provide easier and more convenient access to information that consumers want or need than laptops or fixed broadband—email, stock quotes, news clips, web searches, etc.

Additionally, carriers and application and content providers are working together to provide online shopping and mobile payments from devices. By 2011, the total transaction value of mobile payments is forecast to reach $22 billion world-wide, according to Juniper Research, up from just $2 billion at the end of 2007. Similarly, the proliferation of camera and video

[26] Proposed Decision, p. 23 (emphasis added; citations omitted).

phones combined with broadband capabilities provide consumers access to a myriad of video and photography services they want that are not provided through laptops (or cards).

Finally, hand-helds can even be "tethered" to a computer (via a USB cable or other means) to provide that computer with broadband internet access. Thus, whether a consumer has a hand-held device or a data card would not reveal any reliable evidence regarding the degree to which those services satisfy a customer's on-line "needs"—whatever those may be. Presumably, consumers would not purchase any of these services unless they found them useful.

II. CONCLUSION

As set forth above, AT&T California requests the Proposed Decision by revised to comply with DIVCA by not imposing additional requirements to report subscriber data by census tract or the type of wireless broadband technology used.

Respectfully submitted,

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Appendix A: AT&T California's Recommended Revisions to Proposed Decision's Findings of Fact and Conclusions of Law

Findings of Fact

1. The case-by-case compliance mechanism is an application including a plan in which the franchise holder would justify the reasonableness of its development efforts based on the circumstances peculiar to its service area.

2. GO 169 contains a suitable case-by-case compliance mechanism. The additional guidance set forth below follows closely from Pub. Util. Code § 5890. First, the company-specific application shall contain clearly stated build-out milestones that demonstrate a serious and realistic planning effort by the state video franchise holder. Second, the company-specific application shall clearly state the constraints affecting the applicant's build-out, with particular attention to the types of constraints noted in DIVCA itself.

~~3. Periodic reporting by state video franchise holders provides important information to the Commission that it uses in fulfilling its roles under DIVCA regarding broadband deployment in California and enforcing DIVCA's non-discrimination and build-out requirements.~~

~~4. Reporting of customers' means of access to wireless broadband will further the legislative intent to monitor the penetration of broadband services, especially to unserved or underserved areas within the State.~~

~~5. Reporting by a state video franchise holder of the number of its video customers by census tract, in addition to the number of households that are offered video service, will provide necessary information to the Commission in enforcing the non-discrimination requirements of Pub. Util. Code § 5890(a).~~

~~6~~3. Through oversight, GO 169 failed to include the requirement that a state video franchise holder give notice to incumbent cable operators of the holder's imminent market entry.

~~7~~4. The Commission should adopt renewal rules a reasonable time beforecurrent state video franchises begin to expire in 2017.

~~8~~5. The Commission should institute a rulemaking no later than April 2011, or such earlier time as the matter may be deemed ripe, to adopt principles and policies regarding state video franchise renewals. Any interested person, under Pub. Util. Code § 1708.5(f), may petition the Commission at any time to adopt a regulation pertaining state video franchise renewals. The petition should cite this decision and discuss with specificity the developments, such as changes of law or other occurrences, that cause the renewal issue to be ripe for determination by the Commission.

Conclusions of Law

1. DIVCA requires that state video franchise holders actively develop their franchise.

2. DIVCA requires state video franchise holders to provide non-discriminatory access to their video service.

3. DIVCA gives smaller state video franchise holders flexibility in how they demonstrate compliance with the non-discrimination and build-out requirements of Pub. Util. Code § 5890.

4. The flexibility that the Legislature intended in DIVCA for the smaller telephone companies in demonstrating compliance with DIVCA's non-discrimination and build-out requirements is set forth within the four corners of the statute.

5. Pub. Util. Code § 5890(c) does not mandate or authorize after-the-fact reasonableness review.

6. Pub. Util. Code § 5890(b), regarding non-discriminatory service to lowincome households, should apply to smaller state video franchise holders. Some franchise holders may find difficulty complying if the proportion of low-income households in the holder's service area is relatively low. In such cases, the franchise holder should demonstrate that the percent of low-income households in

its service area to which it provides access to video service correlates closely to the percent of all households provided access.

~~7. The Commission has authority to take actions necessary to carry out its duties under DIVCA, and to that end the Commission may impose additional reporting requirements beyond those set forth in DIVCA.~~

~~8~~7. To the extent that information contained in a report submitted to the Commission pursuant to its video franchise program contains competitively sensitive information, the state video franchise holder submitting the report may request confidential treatment, as provided by Pub. Util. Code § 5960(d).

~~9~~8. DIVCA enlarges the Commission's complaint jurisdiction by directing the Commission to hear a complaint brought by a local government against a state video franchise holder, even though the latter, by express provision of DIVCA, is not a public utility.

~~10~~9. Ordering Paragraph 25 of D.07-03-014 states: "No party shall be awarded intervenor compensation in a proceeding arising under DIVCA." This DIVCA rulemaking itself falls within the broad ambit of the holding in Ordering Paragraph 25. Therefore, the pending NOIs and TURN's request for compensation should also be rejected.

~~11~~10. Today's order should be made effective immediately.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **OPENING COMMENTS OF AT&T CALIFORNIA ON DRAFT OPINION RESOLVING ISSUES IN PHASE II (FILED 8/24/07)** in **R.06-10-005** by electronic mail, hand-delivery and/or by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list for whom an e-mail address has not been posted on the commission's web site.

Executed this 13th day of September, 2007 at San Francisco, California.

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/s/
Agnes Ng

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: R0610005 - CPUC - CABLE TELEVIS
Filer: CPUC - CABLE TELEVISION
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